

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:

BRANDON HEITMANN,

Debtor.

MOHAMED SAAD,

Plaintiff,

v.

BRANDON HEITMANN,

Defendant.

Chapter 7

Case No. 24-41956-MAR

Hon. Mark A. Randon

Adv. Pro. No. 24-04375-mar

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Mohamed Saad, Plaintiff ("Plaintiff"), by his attorneys OSIPOV
BIGELMAN, P.C., states as follows:

1. The Plaintiff seeks Summary Judgment on all counts in the First Amended Complaint (ECF No. 34) for the reasons set forth in the attached brief.
2. Concurrence for the relief sought herein was requested from opposing counsel and refused.

WHEREFORE, the Plaintiff requests that this Court grant Summary Judgment on all counts against the Defendant as more fully set forth in the proposed order granting Summary Judgment.

Dated: August 4, 2025

Respectfully Submitted,

OSIPOV BIGELMAN, P.C.

/s/ Jeffrey H. Bigelman
JEFFREY H. BIGELMAN (P61755)
ANTHONY J. MILLER (P71505)
Attorneys for Plaintiff
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ORDER GRANTING PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

THIS MATTER having come before the Court on Plaintiff's Motion for Summary Judgment, all parties being served pursuant to applicable rules, and the Court being duly advised in the premises:

IT IS HEREBY ORDERED THAT:

- A. A non-dischargeable judgment is granted in favor of Mohamed Saad and against Brandon Heitmann as to Count 1- 11 USC 523(a)(2) in the amount of \$627,803.55;
- B. A non-dischargeable judgment is granted in favor of Mohamed Saad and against Brandon Heitmann as to Count 2- 11 USC 523(a)(4) and Count 3- M.C.L. § 600.2919a in the amount of \$743,189.91;
- C. A non-dischargeable judgment is granted in favor of Mohamed Saad and against Brandon Heitmann as to Count 4- 11 USC 523(a)(6) in the amount of \$627,803.55;

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NOTICE OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Mohamed Saad, Plaintiff ("Plaintiff"), has filed a Motion for Summary Judgment.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion or objection, or if you want the court to consider your views on the motion or objection, within **fourteen (14)** days of the date of this notice, you or your attorney must:

1. File with the court a written response or an answer¹, explaining your position at:

¹ Response or answer must comply with F. R. Civ. P. 8(b), (c) and (e)

**United States Bankruptcy Court
211 West Fort Street, Suite 2100
Detroit, Michigan 48226**

If you mail your response to the court for the filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also send a copy to:

Jeffrey H. Bigelman, Esq.	Office of the U.S. Trustee
OSIPOV BIGELMAN, P.C.	211 W. Fort Street, Suite 700
20700 Civic Center Drive, Suite 420	Detroit, Michigan 48226
Southfield, MI 48076	

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the matter and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought and may enter an order granting that relief.

Respectfully Submitted,
OSIPOV BIGELMAN, P.C.

DATED: August 4, 2025

/s/ Jeffrey H. Bigelman
JEFFREY H. BIGELMAN (P61755)
Attorneys for Plaintiff
20700 Civic Center Drive, Ste. 420
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Phone: (248) 663-1800 Fax: (248) 663-1801
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CERTIFICATE OF SERVICE

RE: Plaintiff's Motion for Summary Judgment, Brief in Support, Proposed Order, Notice, Certificate of Service, Exhibit List, and Exhibits

I hereby certify that on August 4, 2025, I electronically filed the foregoing documents with the Clerk of the Court using the Court's CM/ECF System, which will send electronic notification of such filing to all parties listed by the court as receiving electronic notices in this case from the court's CM/ECF system registered on the ECF System, including:

Notice will be electronically mailed to:

Robert N. Bassel on behalf of Defendant Brandon Heitmann

rbassel@gmail.com, robertbassel@hotmail.com; ecfbassel@gmail.com

Jeffrey H. Bigelman on behalf of Plaintiff Mohamed Saad
jhb_ecf@osbig.com, tc@osbig.com; mk@osbig.com

Anthony James Miller on behalf of Plaintiff Mohamed Saad
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Tyler Phillips on behalf of Defendant Brandon Heitmann
tphillips@kotsangster.com,
lpfund@kotsangster.com; mdelorme@kotsangster.com; aclark@kotsangster.com

Respectfully Submitted,
OSIPOV BIGELMAN, P.C.

DATED: August 4, 2025

/s/ Jeffrey H. Bigelman
JEFFREY H. BIGELMAN (P61755)
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